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4 The Honorable John H. Chun
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

9 ELIZABETH R. PADDOCK,

10 Plaintiff,

11 v.

12 PEACEHEALTH, INC. d/b/a ST. JOSEPH'S
13 MEDICAL CENTER and PEACEHEALTH
14 MEDICAL GROUP, BELLINGHAM
15 ANESTHESIA ASSOCIATES, P.S., FOURTH
16 CORNER NEUROSURGICAL ASSOCIATES,
17 INC., P.S., NORTHWEST RADIOLOGISTS,
INC., P.S., DAVID E. BAKER, M.D., JASON
M. STOANE, M.D., PAUL B. FREDETTE,
M.D., JOHN E. MORRISON, M.D., and TUNG
M. HA, D.O.,

18 Defendants.

19 Case No. 2:21-cv-00639-RSL

20 STIPULATION AND ORDER OF
DISMISSAL WITH PREJUDICE OF
DEFENDANTS NORTHWEST
RADIOLOGISTS, INC., P.S. AND JASON
M. STOANE, M.D.

21 **STIPULATION**

22 All parties, by and through their respective counsel of record, hereby stipulate and agree that
23 any and all claims of causes of action that were or could have been brought by Plaintiff against
24 Defendants Northwest Radiologists, Inc., P.S. and Jason M. Stoane, M.D. herein, are dismissed with
prejudice and without costs and fees to any party.

25 Defendants PeaceHealth, Inc. d/b/a St. Joseph's Medical Center, PeaceHealth Medical
26 Group, Bellingham Anesthesia Associates, P.S., Fourth Corner Neurosurgical Associates, Inc.,

STIPULATION AND ORDER OF DISMISSAL
WITH PREJUDICE OF DEFENDANTS
NORTHWEST RADIOLOGISTS, INC., P.S. AND
JASON M. STOANE, M.D. – 1
2:21-cv-00639-RSL

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Trial Attorneys
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1 David E. Baker, M.D., Paul B. Fredette, M.D., John E. Morrison, M.D., and Tung M. Ha, D.O.
2 further stipulate and agree that they will not allege that Northwest Radiologists, Inc., P.S. and Jason
3 M. Stoane, M.D. are at fault in this matter or that the care they provided Plaintiff was below the
4 standard of care, or that their actions and/or failures to act caused any injury or harm to plaintiff.
5 Defendants PeaceHealth, Inc. d/b/a St. Joseph's Medical Center, PeaceHealth Medical Group,
6 Bellingham Anesthesia Associates, P.S., Fourth Corner Neurosurgical Associates, Inc., David E.
7 Baker, M.D., Paul B. Fredette, M.D., John E. Morrison, M.D., and Tung M. Ha, D.O. further
8 stipulate and agree that they will not seek to allocate fault against Northwest Radiologists, Inc., P.S.
9 and Jason M. Stoane, M.D. pursuant to RCW 4.22.070.

10 DATED this ____ day of January, 2023.

11 MOSELEY COLLINS LAW

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8 *Counsel for Defendant Fredette, M.D.*

9 **ORDER**

10 Having come before the Court upon the Parties' Stipulation and Order of Dismissal with
11 Prejudice, and having fully considered the same and found good cause exists therefor:

12 It is HEREBY ORDERED, ADJUDGED, and DECREED that any and all claims and
13 causes of action which were or could have been brought by Plaintiff against Defendants Northwest
14 Radiologists, Inc., P.S. and Jason M. Stoane, M.D. are hereby dismissed with prejudice and without
15 costs and fees to any party.

16 DATED this 9th day of January, 2023.

17 
18 HON. JOHN H. CHUN
19 United States District Judge

20 Presented by:

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28 WITH PREJUDICE OF DEFENDANTS
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30 JASON M. STOANE, M.D. – 3
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1 Approved as to form, notice of presentation waived:

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1 CERTIFICATE OF SERVICE

2 I hereby certify that on the 9th day of January, 2023, I served the foregoing

3 **STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE OF DEFENDANTS**

4 **NORTHWEST RADIOLOGISTS, INC., P.S. AND JASON M. STOANE, M.D.** on the

5 following parties at the following addresses:

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